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This decision seems to be based on the principle that the inferior has no right in the superior, and therefore the inferior can suffer no loss or injury. 3 *Bl. Comm.* 143. The common law gave to the wife no action for alienation of her husband's affection. *Duffies v. Duffies*, 76 Wis. 374; *Doe v. Roe*, 82 Me. 503. In some jurisdictions, however, the courts recognize that a wife has a right to her husband's society and affection, and, therefore, in a case like the present, a right of action. *Foot v. Card*, 58 Conn., 1. 18 *Atl.* 1027; *Warren v. Warren*, 89 Mich. 123; *Lynch v. Knight*, 9 H. of L. Cas. 589. Lord Campbell said that the wife might have action for the loss of the consortium of her husband. Statutes in this country have so modified the law that where a married woman may sue by herself for personal injuries, she can sue for loss of consortium of her husband. *Bennett v. Bennett*, 116 N. Y. 584; *Bassett v. Bassett*, 20 Ill. App. 543; *Clark v. Harlan*, 1 Cin. Rep. 418; *Leaver v. Adams*, 19 *Atl.* 776; *Westlake v. Westlake*, 34 Ohio St. 621; *Mehehoff v. Mehehoff*, 26 Fed. Rep. 13.

INSURANCE—CHANGE OF TITLE—NOTICE—WHITNEY v. AMERICAN INSURANCE CO. ET AL., 59 Pac. 897 (Col.).—Action brought by the mortgagee to recover the amount of an insurance policy. A mortgage clause in the policy provided "that the mortgagee or trustee shall notify this company of any change of ownership * * * which shall come to his knowledge." One B holding a general power of attorney for C, requested S, the owner of the insured property to make a deed of the property to C, which he did, and B had the deed recorded. Before C had accepted the conveyance, the building on the premises was destroyed by fire, whereupon he refused to accept. B immediately reconveyed the property to S. *Held*, that there was no change of ownership in the property which necessitated notice to the insurer.

The question in this case was whether the handing of the deed to B constituted a delivery. The test of delivery is: Did the grantor by his acts or words intend to divest himself of the title? If so, the deed is delivered. *Austin v. Tendall*, 2 M. S., Arthur, D. C. 362. Generally speaking the delivery of a deed to an agent appointed by the vendee therein to receive it is a delivery to such vendee. *Soward v. Moss*, 78 N. W. 373 (Neb.). In the case under review the court seems not to have regarded B as an agent of C, although he held a general power of attorney from him. Temple, J., dissenting.

INTERNATIONAL LAW—PRIZES—IN RE PUGNETTE HABANA, THE SOLA, 20 Sup. Ct. Rep. 290.—*Held*, vessels flying the enemy's flag engaged in coast fisheries, but carrying no arms, are not subject to capture. See Comment.

INTERSTATE COMMERCE—STATE LAWS AFFECTING—LICENSE TAX IMPOSED BY CITY.—PABST BREWING CO. v. CITY OF TERRE HAUTE ET AL., 98 Fed. Rep. 330.—The common council of Terre Haute, under authority of the Legislature, passed an ordinance imposing a license tax of \$1,000 annually upon every person, corporation or firm maintaining a brewery, depot or agency within the limits of said city. The complainant maintained a depot in the city for storing its goods until they could be delivered, but had in the State of Indiana no brewery or place of manufacture for its goods. The complainant sought an injunction to restrain the enforcement of the ordinance chiefly on the ground that it is in conflict with the commerce clause of the Constitution. *Held*, that such a license tax is invalid, being a tax on interstate commerce, and not an exercise of the police powers of the state within the terms of the Wilson Act (26 Stat. C. 728).

The question is here considered as to the right of a state or city to tax the product of another state coming into it. The Supreme Court has decided that a state may impose a license fee upon intoxicating liquors, brought in from another state, when this license is for the purpose of regulating and controlling